



Via ECFS

September 11, 2008

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification for Year 2007

Dear Ms. Dortch:

In accordance with Public Notice DA 08-171, issued on January 29, 2008, attached is the annual CPNI certification filing for the year of 2007 for Stanton Long Distance, LLC.

Sincerely,

A handwritten signature in dark ink that reads "Robert J. Paden". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert J. Paden
Vice President

Attachment

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: September 11, 2008

Name of company covered by this certification: Stanton Long Distance, LLC

Form 499 Filer ID: 822946

Name of signatory: Robert J. Paden

Title of signatory: Vice President

I, Robert J. Paden, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: 
Robert J. Paden, Vice President

ATTACHMENT

STATEMENT

Stanton Long Distance, LLC (the "Company") has established operating procedures that ensure compliance with the Federal Communications Commission regulations regarding the protection of customer proprietary network information ("CPNI"). These procedures include but are not limited to:

- The Company has established authentication procedures.
- The Company has a process to notify customers of account changes.
- The Company has a process for reporting breaches.
- The Company has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- The Company continually educates and trains its employees regarding the appropriate use of CPNI. The Company has established disciplinary procedures should an employee violate the CPNI procedures established by the Company.
- The Company maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. The Company also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- The Company has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Company compliance for a minimum period of one year. Specifically, the Company's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.